

Kevin M. Rapp (Ariz. Bar No. 14249, kevin.rapp@usdoj.gov)
Margaret Perlmeter (Ariz. Bar No. 024805, margaret.permalink@usdoj.gov)
Peter S. Kozinets (Ariz. Bar No. 019856, peter.kozinets@usdoj.gov)
Andrew C. Stone (Ariz. Bar No. 026543, andrew.stone@usdoj.gov)
Reginald E. Jones (Miss Bar No. 102806, reginald.jones4@usdoj.gov)
John J. Kucera (Cal. Bar No. 274184, john.kucera@usdoj.gov)
Daniel G. Boyle (NY Bar No. 5216825, daniel.boyle2@usdoj.gov)
U.S. ATTORNEY'S OFFICE
40 N. Central Avenue, Suite 1800
Phoenix, Arizona 85004-4408
Telephone (602) 514-7500
Counsel for Plaintiff

Thomas H. Bienert, Jr. (Cal. Bar No. 135311, admitted *pro hac vice*)
tbienert@bienertkatzman.com
Whitney Z. Bernstein (Cal. Bar No. 304971, admitted *pro hac vice*)
wbernstein@bienertkatzman.com
BIENERT | KATZMAN PC
903 Calle Amanecer, Suite 350
San Clemente, CA 92673
Tel.: (949) 369-3700
Fax: (949) 369-3701
Counsel for James Larkin

Additional counsel listed on next page

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

Backpage.com, et al.,

Defendants.

Case No. 2:18-CR-00465-SMB

**JOINT MOTION TO CONTINUE
STATUS CONFERENCE FROM
NOVEMBER 18, 2019 TO
DECEMBER 2, 2019**

1 Paul J. Cambria, Jr., CA State Bar No. 177957, *admitted pro hac vice*
2 Erin E. McCampbell, NY State Bar No. 4480166, *admitted pro hac vice*
3 LIPSITZ GREEN SCIME CAMBRIA LLP
4 42 Delaware Avenue, Suite #120
5 Buffalo, New York 14202
6 Telephone: (716) 849-1333
7 Facsimile: (716) 855-1580
8 Email: pcambria@lglaw.com
9 emccampbell@lglaw.com
10 *Counsel for Michael Lacey*

11 Gary S. Lincenberg, CA State Bar No. 123058, *admitted pro hac vice*
12 Ariel A. Neuman, CA State Bar No. 241594, *admitted pro hac vice*
13 BIRD, MARELLA, BOXER, WOLPERT, NESSIM,
14 DROOKS, LINCENBERG & RHOW, P.C.
15 1875 Century Park East, 23rd Floor
16 Los Angeles, CA 90067-2561
17 Telephone: (310) 201-2100
18 Facsimile: (310) 201-2110
19 Email: glincenberg@birdmarella.com
20 aneuman@birdmarella.com
21 *Counsel for John Brunst*

22 Bruce Feder, AZ Bar No. 004832
23 FEDER LAW OFFICE, P.A.
24 2930 E. Camelback Road, Suite 160
25 Phoenix, Arizona 85016
26 Telephone: (602) 257-0135
27 Email: bf@federlawpa.com
28 *Counsel for Scott Spear*

David Eisenberg, AZ Bar No. 017218
DAVID EISENBERG PLC
3550 N. Central Ave., Ste. 1155
Phoenix, AZ 85012
Telephone: (602) 237-5076
Facsimile: (602) 314-6273
Email: david@deisenbergplc.com
Counsel for Andrew Padilla

Additional counsel listed on next page

1 Joy Malby Bertrand AZ Bar No. 024181
2 JOY BERTRAND ESQ LLC
3 P.O. BOX 2734
4 SCOTTSDALE, AZ 85252-2734
5 Telephone: (602)374-5321
6 Facsimile: (480)361-4694
7 Email: joy.bertrand@gmail.com
8 *Counsel for Joye Vaught*

9 Daniel J. Quigley, AZ Bar No. 011052
10 DANIEL J QUIGLEY PLC
11 5425 E. Broadway Blvd., Ste. 352
12 Tucson, AZ 85711
13 Telephone: (520) 867-4430
14 Email: quigley@djqpplc.com
15 *Counsel for Medalist Holdings, Inc.;*
16 *Leeward Holdings, LLC;*
17 *Camarillo Holdings, LLC;*
18 *Vermillion Holdings, LLC;*
19 *Shearwater Investments, LLC; and*
20 *Cereus Properties, LLC*

1 The government and Claimants¹ (collectively the “Parties”), by and through their
 2 respective counsel of record, jointly move this Court for a continuance of the status
 3 conference scheduled November 18, 2019 in this matter. The Parties agree that good cause
 4 exists to continue the status conference until December 2, 2019, the date the Parties are
 5 scheduled to appear for the continued evidentiary hearing in *United States v. Lacey, et al.*, 18-CR-
 6 00422-PHX-SMB. The Parties anticipate that the status conference will be brief and take no
 7 more than thirty minutes.

8 It is not expected that excludable delay pursuant to 18 U.S.C. § 3161(h) will occur as a
 9 result of this motion or from an order based thereon.

10 Date: November 4, 2019

Respectfully submitted,

11 BIENERT | KATZMAN PC

12 s/ Whitney Z. Bernstein

13 Thomas H. Bienert, Jr.

14 Whitney Z. Bernstein

Attorneys for James Larkin

15 LIPSITZ GREEN SCIME CAMBRIA LLP

16 s/ Paul J. Cambria, Jr.

17 Paul J. Cambria, Jr.

18 Erin McCampbell

Attorneys for Michael Lacey

19 BIRD MARELLA BOXER WOLPERT NESSIM

20 DROOKS LINCENBERG AND RHOW

21 s/ Gary S. Lincenberg

22 Gary S. Lincenberg

23 Ariel A. Neuman

24 Attorneys for John Brunst

25
 26
 27 ¹ As used herein, “Claimants” refers to Michael Lacey, James Larkin, John Brunst, Scott
 28 Spear, Andrew Padilla, Joye Vaught, Medalist Holdings, Inc., Leeward Holdings, LLC,
 Camarillo Holdings, LLC, Vermillion Holdings, LLC, Shearwater Investments, LLC, and
 Cereus Properties, LLC.

FEDER LAW OFFICE, P.A.

s/ Bruce Feder

Bruce Feder

Attorneys for Scott Spear

DAVID EISENBERG PLC

s/ David Eisenberg

David Eisenberg

Attorneys for Andrew Padilla

JOY BERTRAND ESQ LLC

s/ Joy Bertrand

Joy Bertrand

Attorneys for Joye Vaught

DANIEL J QUIGLEY PLC

s/ Daniel J. Quigley

Daniel J. Quigley

Attorneys for Medalist Holdings, Inc.;
Leeward Holdings, LLC; Camarillo Holdings,
LLC; Vermillion Holdings, LLC; Shearwater
Investments, LLC; and Cereus Properties, LLC

MICHAEL BAILEY

United States Attorney

District of Arizona

/s John J. Kucera

Kevin M. Rapp

Margaret Perlmeter

Peter S. Kozinets

Andrew C. Stone

John J. Kucera

Daniel G. Boyle

Reginald E. Jones

Assistant U.S. Attorneys

Certificate of Service

I hereby certify that on November 4, 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

s/ Toni Thomas

Toni Thomas

David L. Botsford, Botsford & Roark, dbotsford@aol.com

Erin E. McCampbell, Lipsitz Green Scime Cambria LLP, emccampbell@lglaw.com

Paul John Cambria, Jr., Lipsitz Green Scime Cambria LLP, pcambria@lglaw.com

Daniel James Quigley, Daniel J Quigley PLC, quigley@djqpplc.com

Thomas H. Bienert, Jr., Bienert | Katzman PC, tbienert@bienertkatzman.com

Whitney Z. Bernstein, Bienert | Katzman PC, wbernstein@bienertkatzman.com

K. C. Maxwell, Maxwell Law PC, kcm@kcmaxlaw.com

Ariel A. Neuman, Bird Marella, aan@birdmarella.com

Gary S. Lincenberg, Bird Marella, gsl@birdmarella.com

Gopi K. Panchapakesan, Bird Marella, gkp@birdmarella.com

Michael D. Kimerer, Kimerer & Derrick PC, MDK@kimerer.com

Rhonda Elaine Neff, Kimerer & Derrick PC, rneff@kimerer.com

Bruce S. Feder, Feder Law Office PA, bf@federlawpa.com

James P. Whalen, Whalen Law Office, jwhalen@whalenlawoffice.com

Ryne T. Sandel, Whalen Law Office, rsandel@whalenlawoffice.com

Joy Bertrand, Joy Bertrand Esq LLC, joy.bertrand@gmail.com

David Eisenberg, David Eisenberg PLC, david@deisenbergplc.com,

Andrew C. Stone, Assistant U.S. Attorney, andrew.stone@usdoj.gov

John J. Kucera, Assistant U.S. Attorney, john.kucera@usdoj.gov

Kevin M. Rapp, Assistant U.S. Attorney, kevin.rapp@usdoj.gov

Margaret Wu Perlmeter, Assistant U.S. Attorney, Margaret.perlmeter@usdoj.gov

Reginald E. Jones, Assistant U.S. Attorney, reginald.jones@usdoj.gov

Peter Shawn Kozinets, Assistant U.S. Attorney, peter.kozinets@usdoj.gov

Daniel G. Boyle, Assistant U.S. Attorney, daniel.boyle2@usdoj.gov

1
2
3
4
5
6
7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF ARIZONA
10

11 United States of America,
12
13 Plaintiff,
14 vs.
15 Backpage, *et al.*,
16 Defendants.

CASE NO. 2:18-cr-00465-SMB

[PROPOSED] ORDER

17
18 The Court, having reviewed the Parties' Joint Motion to reschedule the Status Conference
19 from November 18, 2019 to December 2, 2019 and good cause appearing,

20 **IT IS ORDERED** that the Joint Motion to reschedule the November 18, 2019 Status
21 Conference until December 2, 2019 is granted.
22
23

24 _____
25 Honorable Susan M. Brnovich
26 District Court Judge
27
28